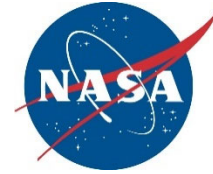


National Aeronautics and Space Administration



Langley Research Center
100 NASA Road
Hampton, VA 23681-2199

August 14, 2026

Reply to Attn of: 30/Office of General the Counsel - Langley

TO: Distribution

FROM: Chief Counsel

SUBJECT: Ethics Determination Regarding NASA Employee Attendance at the Virginia Aerospace Business Association (VASBA) Gala, September 24, 2026

On September 24, 2026, the Virginia Aerospace Business Association (VASBA), will host a Gala at the David Student Union at Christopher Newport University in Newport News, VA.

The organizers expect approximately 200 people to attend, including invited NASA employees, military and civilian employees of other agencies, aerospace companies, government support contractors, educators, state and local community leaders, and state elected officials.

The Gala will consist of drinks, dinner, and musical entertainment as well as guest speakers, which is valued at \$161.90 per person (event and ticket processing fee).

In addition to the host of this event, the sponsors of the event will likely include Adaptive Aerospace Group, Inc., Adnet Systems, Amentum, Analytical Mechanics Associates, Analytical Services & Materials, Inc., National Institute of Aerospace, Psionic, Science & Technology Corporation, Sierra Lobo, ViGYAN, and Virginia Institute for Spaceflight & Autonomy.

Invited NASA personnel may accept free attendance in accordance with 5 C.F.R. §2635.204(g) and 14 C.F.R. §1207.103, I find that this event meets the definition of a “widely attended gathering.” I also find that there is an Agency interest in having invited NASA personnel attend this event, as it will further Agency programs and interests. NASA invitees will have the opportunity to discuss the Administration’s activities, and exchange information on NASA programs. I further conclude that NASA’s interest in its employees attending this event outweighs any concern that attendance may appear to improperly influence NASA personnel in the performance of their official duties.

At the Gala, others in attendance will generally be accompanied by a guest. Accordingly, NASA employees who have been invited to attend may accept free attendance at the reception for themselves and one invited guest.

NASA employees who have a significant role in any pending sensitive matter that will substantially affect the interests of the host and sponsors, and NASA employees who have non-career political appointments, are not covered by this determination and should seek a separate determination from their ethics counselor regarding their participation in this event.

Questions about this determination may be addressed to Sara Rathgeber at sara.m.rathgeber@nasa.gov or 757-864-4301.

Andrea Z. Warmbier
Chief Counsel